

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

**BARRY DAVIS,
Defendant.**

CRIMINAL NO. 16cr 10133

VIOLATIONS:

**18 U.S.C. §1591(a) and (b)(1) – Sex
Trafficking by Force, Fraud and
Coercion**

**18 U.S.C. §2421 – Transportation of an
Individual for Prostitution**

**18 U.S.C. §§1594, 2428 – Criminal
Forfeiture Allegation**

INDICTMENT

COUNT ONE: (18 U.S.C. §1591(a) and (b)(1) – Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury charges that:

In or around August 2015, in the Districts of Massachusetts and Connecticut and elsewhere,

BARRY DAVIS,

the defendant herein, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize and solicit by any means a person, Victim #1, whose identity is known to the Grand Jury, and did benefit, financially and by receiving anything of value, from participation in a venture that has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means would be used to cause Victim #1 to engage in a commercial sex act.

All in violation of 18 U.S.C. §1591(a) and (b)(1).

COUNT TWO: (18 U.S.C. §2421 - Transportation of an Individual With Intent to Engage in Prostitution)

The Grand Jury further charges that:

In or around August 2015, in the Districts of Massachusetts and Connecticut and elsewhere,

BARRY DAVIS,

the defendant herein, did knowingly transport an individual, Victim #1, whose identity is known to the Grand Jury, in interstate commerce between Massachusetts and Connecticut, with the intent that Victim #1 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT THREE: (18 U.S.C. §1591(a) and (b)(1) – Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury further charges that:

In or around August 2015, in the Districts of Massachusetts and Connecticut and elsewhere,

BARRY DAVIS,

the defendant herein, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit a person, Victim #2, whose identity is known to the Grand Jury, and did benefit, financially and by receiving anything of value, from participation in a venture that has engaged in any such act, knowing and in reckless disregard of the fact that Victim #2 would be caused to engage in a commercial sex act by means of force, threats of force, fraud, and coercion, and any combination of such means.

All in violation of 18 U.S.C. §1591(a) and (b)(1).

COUNT FOUR: (18 U.S.C. §2421 - Transportation of an Individual With Intent to Engage in Prostitution)

The Grand Jury further charges that:

In or around August 2015, in the Districts of Massachusetts and Connecticut and elsewhere,

BARRY DAVIS,

the defendant herein, did knowingly transport an individual, Victim #2, whose identity is known to the Grand Jury, in interstate commerce between Massachusetts and Connecticut, with the intent that Victim #2 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

FORFEITURE ALLEGATIONS
18 U.S.C. §§1594, 2428

The Grand Jury further charges:

1. Upon conviction of any offense in violation of 18 U.S.C. §1591 or 18 U.S.C. §2421 charged in Counts One through Four of this Indictment,

BARRY DAVIS,

the defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. §§2428 and 1594 (i) any property, real or personal, that was used or intended to be used to commit or facilitate the commission of one or more violations of 18 U.S.C. §1591 or 18 U.S.C. §2421; and (ii) any property, real or personal, that constitutes or was derived from proceeds obtained, directly or indirectly, as a result of any such violations.


2. If any of the property described in paragraph 1 above, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

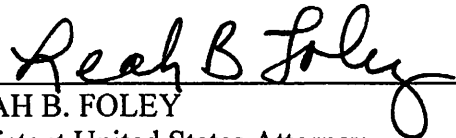
it is the intention of the United States, pursuant to 18 U.S.C. §853(p), incorporated by reference in 28 U.S.C. §2461(c), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Sections 1594 and 2428.

A TRUE BILL,



FOREPERSON OF THE GRAND JURY

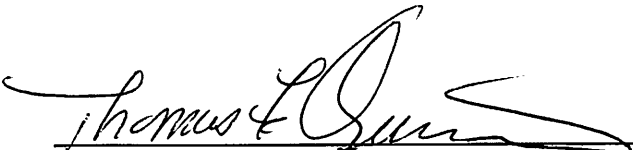


LEAH B. FOLEY
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS

May // , 2016

Returned into the District Court by the Grand Jurors and filed.



Deputy Clerk
5/11/2016 @ 3:40pm